

REMARKS/ARGUMENT

Claims 1-9, 11-26, 28-38, 41-43, 47-48, 51-53, and 57-68 are pending in the present application. Claims 10, 27, 39-40, 44-45, 49-50 and 54-55 were previously cancelled. Claims 46 and 56 are presently cancelled. Claims 22, 42, 52, and 58 are amended. Claims 61-68 have been added. Support for the added and amended claims can be found throughout the specification including, for example, in FIG. 1, 3-5, and 9 and paragraphs [0019]-[0032], [0035]-[0056], [0067]-[0072], and [0075] of pre-grant publication US 2004/0028266. No new matter has been added.

Reconsideration of the claims based on the below comments is respectfully requested.

Obviousness Rejection of Claims 1-9, 11-26, 28-38, 41-43, 51-53, and 56-60 Based On Paraskevagos in view of Baird

In the April 4, 2007 non-final Office Action, claims 1-9, 11-26, 28-38, 41-43, 51-53, and 56-60 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Paraskevagos U.S. Patent No. 7,006,664 (“Par”) in view of Baird EP 1 041 523 A2 (“Baird”).

Par’s system differs from the claimed invention as described below. Par discloses a system for authenticating currency using a scanner along with optical character recognition software to recognize a currency by denomination or serial number. (column 2, lines 9-18.) Par further discloses digitally storing the serial number of the currency bill and transmitting the numbers from the bills through a communication link to a central processing authority. (column 2, lines 17-18; column 3, lines 16-27.) Par also discloses adding an electronic ID to the optically recognized numbers for a passing bill. (column 2, lines 32-34.) As acknowledged by the April 4, 2008 Office action, Par fails to disclose or suggest a processor operable to create a data file comprising one or more currency bill images, wherein each currency bill image is tagged with the extracted serial number of that currency bill and the identifier of the transaction involving

that currency bill to allow for the involved one or more currency bills to be subsequently traced by serial number to that transaction.

Baird fails to overcome the deficiencies of Par. Baird describes a method of storing a transaction record in a memory 40 together with images recorded by a camera 22, the record being identifiable by reference to a random code generated in respect to the transaction by a generator 32. *See, e.g.*, ¶ [0033]. Baird further describes image of tokens being recorded and retained and overlain by a transaction identifier, and possibly other transaction or user identity details, allowing straightforward visual comparison of the deposited tokens with recorded transaction details. *See* ¶ [0012]. Baird describes the transaction identifier as consisting of numbers representative of the time and date when a transaction took place. *See* ¶ [0016]. While Baird may disclose an image overlain by a transaction identifier, Baird **fails** to teach or suggest creating a data file comprising an image tagged with a transaction identifier and with information extracted from the image, such as a serial number of a currency bill or a unique identifier.

Independent Claim 1

Claim 1 recites a currency bill scanning device including, *inter alia*, a “processor operable to create a data file comprising one or more currency bill images, wherein each currency bill image is tagged with the extracted serial number of that currency bill and the identifier of the transaction involving that currency bill”. As discussed above, the applied Par and Baird references do not disclose, teach or suggest such limitations.

For at least these reasons, claim 1 is not and cannot be rendered obvious by Par, Baird, or any combination thereof, and thus, should be in a condition for allowance.

Dependent Claims 2-9, 11-21, and 59

Claims 2-9, 11-21, and 59, which depend from claim 1, are not and cannot be rendered obvious by Par, Baird, or any combination thereof, for at least the reasons discussed above in connection with claim 1. Thus, claims 2-9, 11-21, and 59 should also be in a condition for allowance.

Independent Claim 22

Amended claim 22 recites a currency bill scanning method including, *inter alia*, creating a data file comprising fields populated with the one or more currency bill images, wherein each currency bill image field is populated with additional subfields including the extracted serial number of that currency bill and the identifier of the transaction involving that currency bill to allow for the involved one or more currency bills to be subsequently traced by serial number to that transaction. The applied Par and Baird references do not disclose, teach or suggest such limitations.

As discussed above, Par describes reading serial numbers of currency bills and transmitting the numbers from the bills through a communication link. (*See, e.g.*, column 2, lines 17-18; column 3, lines 16-27; column 4, lines 59-61.) Par also discloses adding an electronic ID to the optically recognized numbers for a passing bill. (column 2, lines 32-34.) However, Par does not disclose or suggest creating a data file comprising fields populated with currency bill images or subfields including the extracted serial number and the identifier of the transaction. As also discussed above, Baird does not overcome the deficiencies of Par.

For at least these reasons, amended claim 22 is not and cannot be rendered obvious by Par, Baird, or any combination thereof, and thus, should be in a condition for allowance.

Dependent Claims 23-26, 28-36, and 60

Claims 23-26, 28-36, and 60, which depend from claim 22, are not and cannot be rendered obvious by Par, Baird, or any combination thereof, for at least the reasons discussed above in connection with claim 22. Thus, claims 23-26, 28-36, and 60 should also be in a condition for allowance.

Independent Claims 37, 47, and 57

Claim 37 recites a method for **distributing** currency bills including, *inter alia*, (i) obtaining an identifier for a currency bill distribution or reception transaction, and (ii) linking a currency bill image with the serial number for the distributed currency bill and the transaction identifier. Claims 47 and 57 recite devices for distributing currency bills including, *inter alia*, a

mechanism for distributing a number of currency bills. The applied Par and Baird references do not disclose, teach or suggest such limitations. That is, neither reference teaches methods or systems for distributing currency in the context of the recited claim elements.

For at least the reasons cited herein and the discussions above regarding the Par and Baird, claims 37, 47, and 57 are not and cannot be rendered obvious by Par, Baird, or any combination thereof, and thus, should be in a condition for allowance.

Dependent Claims 38, 41, 48, and 51

Claims 38, 41, 48, and 51, which depend from either claims 37 or 47, are not and cannot be rendered obvious by Par, Baird, or any combination thereof, for at least the reasons discussed above in connection with claims 37 and 47. Thus, claims 38, 41, 48, and 51 should also be in a condition for allowance.

Independent Claims 42, 52, and 58

Amended claim 42 recites a method for receiving currency bills including, *inter alia*, (i) obtaining an identifier for a currency bill distribution or reception transaction, (ii) linking a currency bill image with the serial number for the received currency bill and the transaction identifier, and (iii) the linking comprising forming an image file populated with fields containing the at least partial image of each currency bill for that transaction, the serial number of those currency bills, and the transaction identifier. Amended claims 52 and 58 recite devices for receiving currency bills including, *inter alia*, a processor operable for linking a currency bill image(s) with serial number(s) for received currency bill(s) and a transaction identifier so as to allow the received currency bills to be traced to a certain transaction by their serial number, wherein the linking comprises forming an image file populated with fields containing the at least partial image of each currency bill for that transaction, the serial number of those currency bills, and the transaction identifier. The applied Par and Baird references do not disclose, teach or suggest such limitations.

For at least the reasons cited herein and the discussions above regarding the Par and Baird, amended claims 42, 52, and 58 are not and cannot be rendered obvious by Par, Baird, or any combination thereof, and thus, should be in a condition for allowance.

Dependent Claims 43 and 53

Claims 43 and 53, which depend from either claims 42 or 52, are not and cannot be rendered obvious by Par, Baird, or any combination thereof, for at least the reasons discussed above in connection with claims 42 and 52. Thus, claims 43 and 53 should also be in a condition for allowance.

New Claims 61-68

To expedite prosecution, the Applicant will comment on the applied Par and Baird references with respect to new claims 61-68. Independent claims 61 recites a substitute currency media scanning device, including, *inter alia*, a processor configured to create a data file comprising the obtained images of the substitute currency media, wherein each obtained image is tagged with the extracted unique identifier and the obtained transaction identifier such that one or more of the substitute currency media are traceable by the unique identifier or the transaction identifier. Neither Par nor Baird disclose a substitute currency media scanning device.

For at least these reasons and for similar reasons discussed above in connection with claims 1, 22, 42, 52, and 58, Par, Baird, or any combination thereof, would not and cannot render claims 61-68 as obvious. Thus, claims 61-68 should be in a condition for allowance.

CONCLUSION

Applicants submit that claims 1-9, 11-26, 28-38, 41-43, 47-48, 51-53, and 57-68 are in condition for allowance and action toward that is respectfully requested. If there are any matters which may be resolved or clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney at (312) 425-8552.

It is believed that no fees are due other than the RCE, extension of time, and additional claim fee. In addition to the RCE and extension of time fees authorized in the concurrently filed RCE and petition for extension of time, the Commissioner is authorized to deduct the \$210 claim fee, for one additional independent claim, from **Nixon Peabody Deposit Account No. 50-4181, Order No. 247171-000379USP1**. Should any additional fees be required (except for payment of the issue fee), or credit for overpayment be due, the Commissioner is also authorized to deduct the fees from, or credit the overpayment to, the same Nixon Peabody deposit account.

Respectfully submitted,

Dated: September 4, 2008

/Peter J. Prommer, Reg. No. 54743/
Peter J. Prommer
NIXON PEABODY LLP
161 N. Clark Street, 48th Floor
Chicago, Illinois 60601
(312) 425-3900 – main
(312) 425-3909 – facsimile

ATTORNEY FOR APPLICANT